

## **EPA Comments for Proposed Title V Permit Renewal Evaluation for Covanta Delano, Facility ID S-75, Project # S-1071550**

### **General**

On page 20 of the Districts evaluation several emission units are evaluated for CAM (Part 64 applicability). Most of the control devices are various types of fabric filters. In all cases the permits requires daily monitoring of the pressure drop across the filter and a comparison of this value to the range established for each device. However, for certain units, other key elements are missing from the permit conditions. Please see the comments below for individual permit units:

#### **Comment 1: Permit unit 75-1**

A. The equipment description does not provide any description of or indicate the number of fabric collection systems. EPA does note that these descriptions are in various permit conditions within the permit. EPA suggests revising the equipment description to at least indicate that the equipment is equipped with 3 fabric collectors.

B. Condition 23 requires the differential pressure to remain between 1 and 7 inches of water column pressure, but the evaluation does not explain how these ranges were determined. These ranges should be determined through correlation of source test data. Please add an explanation to the evaluation explaining how and/or why this range is appropriate to ensure compliance with the applicable emission standards.

C. Condition 48 requires visible emissions (VE) to be evaluated daily using EPA Method 9, but there is no VE standard in the permit for the fabric collectors and no condition requiring any type of action if a Method 9 violation is found. Since VE are being monitored to ensure compliance with PM10 emission limits from the fabric collectors, and no direct correlation between opacity and PM10 emission rates have been established, the opacity rate required to be monitored is 0% opacity, with a requirement for immediate corrective action. Since a precise measurement of opacity is not required to determine if corrective action is required, EPA suggests revising the required Test Method to EPA Method 22, which does not require a certified observer for the test. A condition must be added to the permit to require corrective action to be taken within 24 hours if any VE are seen from the fabric collector stacks. This corrective action should consist of inspecting the fabric collectors and taking any actions necessary to eliminate the VE.

#### **Comment 2: Permit unit 75-9**

A. The equipment description does not provide any description of or indicate the number of fabric collection systems. EPA does note that these descriptions are in various permit conditions within the permit. EPA suggests revising the equipment description to at least indicate that the equipment is equipped with 3 fabric collectors.

B. Condition 24 requires the differential pressure to remain between 1 and 7 inches of water column pressure, but the evaluation does not explain how these ranges were determined. These ranges should be determined through correlation of source test data. Please add an explanation to the evaluation explaining how and/or why this range is appropriate to ensure compliance with the applicable emission standards.

C. Condition 47 requires visible emissions (VE) to be evaluated daily using EPA Method 9 but does not specify for which equipment and/or specific emission points this test is required for. In addition, there is no VE standard in the permit for the fabric collectors and no condition requiring any type of action if a

Method 9 violation is found. Since VE are being monitored to ensure compliance with PM10 emission limits from the fabric collectors, and no direct correlation between opacity and PM10 emission rates have been established, the opacity rate required to be monitored is 0% opacity, with a requirement for immediate corrective action. Since a precise measurement of opacity is not required to determine if corrective action is required, EPA suggests revising the required Test Method to EPA Method 22, which does not require a certified observer for the test. A condition must be added to the permit to require corrective action to be taken within 24 hours if any VE are seen from the fabric collector stacks. This corrective action should consist of inspecting the fabric collectors and taking any actions necessary to eliminate the VE. Please also revise Condition 47 to indicate which equipment and/or emission points are to be evaluated daily.

**Comment 3: Permit unit 75-10**

A. The equipment description does not provide any description of or indicate the number of fabric collection systems. EPA does note that these descriptions are in various permit conditions within the permit. EPA suggests revising the equipment description to at least indicate that the equipment is equipped with 2 fabric collectors.

B. Condition 24 requires the differential pressure to remain between 1 and 7 inches of water column pressure, but the evaluation does not explain how these ranges were determined. These ranges should be determined through correlation of source test data. Please add an explanation to the evaluation explaining how and/or why this range is appropriate to ensure compliance with the applicable emission standards.

C. Condition 41 requires visible emissions (VE) to be evaluated daily using EPA Method 9 but does not specify for which equipment and/or specific emission points this test is required for. In addition, there is no VE standard in the permit for the fabric collectors and no condition requiring any type of action if a Method 9 violation is found. Since VE are being monitored to ensure compliance with PM10 emission limits from the fabric collectors, and no direct correlation between opacity and PM emission rates have been established, the opacity rate required to be monitored is 0% opacity, with a requirement for immediate corrective action. Since a precise measurement of opacity is not required to determine if corrective action is required, EPA suggests revising the required Test Method to EPA Method 22, which does not require a certified observer for the test. A condition must be added to the permit to require corrective action to be taken within 24 hours if any VE are seen from the fabric collector stacks. This corrective action should consist of inspecting the fabric collectors and taking any actions necessary to eliminate the VE. Please also revise Condition 41 to indicate which equipment and/or emission points are to be evaluated daily.

**Comment 4: Permit unit 75-6**

A. The equipment description indicates that the exhaust is vented to a multicyclone and fabric filter. The permit does not provide any description of the size or type of fabric collection system in either the equipment description or in a permit condition. Please provide a condition that includes that specification of both the multicyclone and fabric filter systems, similar to the conditions included in the permits discussed above.

B. Condition 7 requires the establishment of correlation parameters for the differential pressure across the fabric filter and the opacity compared to the allowable PM10 emission rate. Since this is a renewal permit, EPA assumes that these parameters have been established: if so, they should be specified within the permit as a permit condition.

C. While Condition 68 sets an opacity limit based on the PSD permit, there is no requirement for the source to comply with the opacity limit determined based on correlation of the PM10 emission limit and opacity. EPA notes that we have observed that such correlations are very difficult to obtain because they are inconsistent from one source test to another. In addition the permit does not require any corrective action if the opacity reading exceeds the value established through correlation. Since this unit is also a major source after controls (see page 24 of District evaluation), and therefore requires a monitoring frequency of every 15 min, EPA has determined for similar baghouse control devices that CAM is an air leak detection system or a continuous PM10 emission monitor.

Since this unit is not currently equipped with either of these devices, the equipment does not satisfy the Part 64 CAM requirements. The Title V permit must be revised to include a compliance schedule for the source to install, calibrate and operate either of the two monitoring devices. The correlation range or conditions would then need to also be incorporated into the Title V permit.

**Comment 5: Permit unit 75-11**

The exact same comments, with different condition number references, also apply to this emission unit.